

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-203-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	
)	

**JOINT MOTION FOR ENTRY OF SUPPLEMENTAL PROTECTIVE ORDER
FOR TEXAS INSTRUMENTS**

Plaintiff Netlist, Inc. (“Netlist”) and Defendants Micron Technology, Inc.; Micron Semiconductor Products, Inc.; and Micron Technology Texas LLC (collectively “Micron”) (collectively “the Parties”) respectfully file this Joint Motion for Entry of Supplemental Protective Order for Texas Instruments. Netlist subpoenaed non-party Texas Instruments Incorporated (“TI”). TI requested the additional protections reflected in the Supplemental Protective Order filed concurrently herewith. Netlist and Micron stipulate to the entry of that Supplemental Protective Order, and respectfully request that the Court enter it to facilitate discovery in this Action.

Dated: March 10, 2023

Respectfully submitted,

/s/ Thomas C. Werner

Jason Sheasby (*pro hac vice*)
jsheasby@irell.com
H. Annita Zhong, PhD (*pro hac vice*)

jsheasby@irell.com
Thomas C. Werner (*pro hac vice*)
twerner@irell.com
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel. (310) 277-1010
Fax (310) 203-7199

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 East Houston Street Suite 300
Marshall, TX 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

Attorneys for Plaintiff Netlist, Inc.

Dated: March 10, 2023

/s/ Michael R. Rueckheim

Thomas M. Melsheimer
State Bar No. 13922550
TMelsheimer@winston.com
Natalie Arbaugh
State Bar No. 24033378
NArbaugh@winston.com
Barry K. Shelton
State Bar No. 24055029
BShelton@winston.com
WINSTON & STRAWN LLP
2121 N. Pearl Street, Suite 900
Dallas, TX 75201
Telephone: (214) 453-6500
Facsimile: (214) 453-6400

Michael R. Rueckheim
State Bar No. 24081129
MRueckheim@winston.com
WINSTON & STRAWN LLP
255 Shoreline Drive, Suite 520
Redwood City, CA 94065

Telephone: (650) 858-6500
Facsimile: (650) 858-6559

Matthew Hopkins
Pro Hac Vice
State Bar No. 1500598
MHopkins@winston.com
WINSTON & STRAWN LLP
1901 L Street, N.W.
Washington, D.C. 20036-3506
Telephone: (202) 282-5000
Facsimile: (202) 282-5100

Juan C. Yaquian
Pro Hac Vice
State Bar No. 24110559
JYaquian@winston.com
WINSTON & STRAWN LLP
800 Capital Street, Suite 2400
Houston, TX 77002-2925
Telephone: (713) 651-2600
Facsimile: (713) 651-2700

Wesley Hill
State Bar No. 24032294
Andrea Fair
State Bar No. 24078488
Charles Everingham IV
State Bar No. 00787447
WARD, SMITH & HILL, PLLC
P.O. Box 1231
Longview, Texas 75606-1231
Telephone: (903) 757-6400
Facsimile: (903) 757-2323
Email: wh@wsfirm.com
andrea@wsfirm.com
ce@wsfirm.com

***Attorneys for Defendants Micron Technology,
Inc.; Micron Semiconductor Products, Inc.; and
Micron Technology Texas LLC***

CERTIFICATE OF CONFERENCE

I hereby certify that counsel have complied with the meet and confer requirement in Local Rule CV-7(h) and this Court's Orders and that all parties join in this motion.

/s/ Thomas C. Werner
Thomas C. Werner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served March 10, 2023 on all counsel who have consented to electronic service.

/s/ Thomas C. Werner
Thomas C. Werner